

## Appointment

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**From:** Hathaway, Margaret [Hathaway.Margaret@epa.gov]  
**Sent:** 4/17/2019 9:38:56 PM  
**To:** Hathaway, Margaret [Hathaway.Margaret@epa.gov]; Collantes, Margarita [Collantes.Margarita@epa.gov]; Doherty, Michael [Doherty.Michael@epa.gov]; Lowe, Kelly [Lowe.Kelly@epa.gov]; Swartz, Christina [Swartz.Christina@epa.gov]; Yozzo, Krystle [yozzo.krystle@epa.gov]; Di Salvo, Paul [DiSalvo.Paul@epa.gov]; Eagle, Venus [Eagle.Venus@epa.gov]; Herrick, Jacquelyn [Herrick.Jacquelyn@epa.gov]; Laws, Meredith [Laws.Meredith@epa.gov]; DCRoomPYS9671/Potomac-Yard-One [DCRoomPYS9671@epa.gov]; Jones, Ricardo [Jones.Ricardo@epa.gov]; Snyderman, Steven [Snyderman.Steven@epa.gov]  
**Subject:** HED-PRD-RD Chat re. Thiamethoxam Occupational Handler – Seed Treatment PPE  
**Attachments:** Syngenta response to EPA Risk Mitigation Proposal for Thiamethoxam 041119.pdf  
**Location:** DCRoomPYS9671/Potomac-Yard-One <DCRoomPYS9671@epa.gov>  
**Start:** 4/18/2019 5:30:00 PM  
**End:** 4/18/2019 6:00:00 PM  
**Show Time As:** Tentative

**Required Attendees:** Collantes, Margarita; Doherty, Michael; Lowe, Kelly; Swartz, Christina; Yozzo, Krystle; Di Salvo, Paul; Eagle, Venus; Herrick, Jacquelyn; Laws, Meredith; DCRoomPYS9671/Potomac-Yard-One; Jones, Ricardo; Snyderman, Steven

### Conference Line/Code / Ex. 6

Hello All:

**Meeting Purpose:** Syngenta has provided comments on OPP's current mitigation proposal for thiamethoxam. One topic they brought up was proposed PPE for occupational handler risks from seed treatment uses. PRD would like to discuss the implications of Syngenta's comments (full comments attached; excerpt below) on this topic.

**Background:** Syngenta is arguing that volume-based restrictions on their labels mean that additional PPE is unneeded. In past conversations, OPP has leaned towards agreeing with this proposal. Either way, however, PRD is wondering how to best phrase proposed label language in the thiamethoxam PID. Additionally, PRD is wondering how to phrase label language to account for the fact that other labels may have volume-based restrictions, but not ones that equate to the same exposure scenario as those that appear on Syngenta labels. Would any volume-based restriction be sufficient to remove the need for additional PPE? If not, where is HED's cutoff?

**Syngenta Comments:**

### **Occupational Handler – Seed Treatment**

Proposed PPE:

Syngenta Response: EPA did not take into account the volume restrictions for corn. Provided volume restrictions remain as written on Cruiser 5FS label, and are added to all Cruiser corn seed treatment labels, respirator and additional closed system restrictions unnecessary.

1. Double layer + gloves + respirator
  - a. Corn (field) – multiple activities
  - b. Corn (sweet) – mixer/loader

Syngenta response: Respirator not required due to gallon restriction.

Require Closed Loading System:

1. Corn (popcorn) – multiple activities and mixer/loader
2. Corn (sweet) – multiple activities

Syngenta Response: Closed system not required due to gallon restriction.